

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

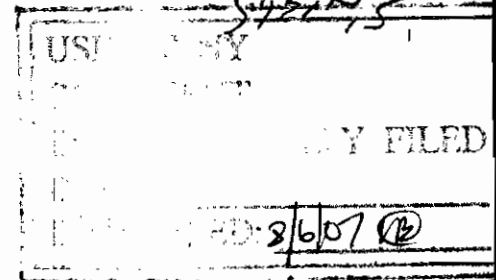
INTERNATIONAL FINANCE CORPORATION,
not in its individual capacity but solely as the
Trustee for the IFC-Netherlands Carbon Facility,

Plaintiff.

-against-

KORAT WASTE TO ENERGY CO. LTD.,
(a/k/a KHORAT WASTE TO ENERGY CO.),

Defendant.



07 Civ. 5451 (SHS) (ECF)

JOINT REPORT ON SCHEDULING
CONFERENCE AND DISCOVERY
PLAN

Having conferred pursuant to Federal Rule of Civil Procedure 26(f), Plaintiff and Defendant hereby submit this joint report for the Court's consideration.

Initial Disclosures (Fed. R. Civ. P. 26(f)(1))

The parties propose that initial disclosures shall be served by August 31, 2007.

Extent of Discovery (Fed. R. Civ. P. 26(f)(2))

The parties anticipate that discovery will be required on the following subjects:

1. Documents created in connection with the negotiations between the parties, and other documents relevant to the claims in the Complaint and any defenses; and
2. Communications between the parties and other third parties relevant to the claims in the Complaint and any defenses.

The parties anticipate that discovery can be completed by February 29, 2008. The parties do not see any complications in this matter necessitating conducting discovery in phases or otherwise limiting discovery. The parties request that the Court schedule a conference in this matter shortly after the conclusion of discovery to discuss further disposition of this matter.

Electronic Discovery (Fed. R. Civ. P. 26(f)(3))

The parties do not that foresee any difficulties with producing electronically stored information, or producing discovery materials in electronic format.

Claims of Privilege (Fed. R. Civ. P. 26(f)(4))

The parties do not foresee any unusual issues relating to claims of privilege. Any assertions of privilege will be made consistent with Local Civil Rule 26.2. The parties have agreed that in the event of inadvertent disclosure of privileged material, such material will be promptly returned to the party which inadvertently disclosed the material, and the material will not be used in this litigation. However, the producing party will be required to notify the receiving party within five business days of learning of the inadvertent disclosure or will be deemed to have waived the privilege.

Limitations on Discovery (Fed. R. Civ. P. 26(f)(5))

The parties have not identified any limitations that should apply to discovery in this matter other than those in the Federal Rules of Civil Procedure and Local Rules.

Other Orders (Fed. R. Civ. P. 26(f)(6))

The parties will draft a proposed protective order and submit it to the Court for approval.

Dated August 3, 2007

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DO ORDERED

U.S.D.J.